

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA
ex rel., BROOKS WALLACE,
ROBERT FARLEY and
MANUEL FUENTES**

Plaintiffs,

v.

EXACTECH, INC.

Defendant.

**CIVIL ACTION NO:
2:18-CV-01010-LSC**

UNOPPOSED

**AMENDED (UNOPPOSED) MOTION TO EXTEND CASE
DEADLINES**

COMES NOW, the Plaintiffs/Relators and file this Amended Motion to Extend Case Deadlines in the above-referenced matter. As grounds the Plaintiffs/Relators state the following:

1. On or about September 3, 2021, the Relators filed a Motion to Extend Case Deadlines. (Doc. No. 96)
2. This Honorable Court held a telephone conference regarding said motion. (Doc. No. 97) During said hearing the Court instructed the parties to revise

the proposed scheduling order so that the proposed dispositive motion deadline would occur in December 2021.

3. After careful consideration and consultation with each other, the Parties have modified the proposed scheduling order as follows:

- November 16, 2021: Defendant's Corporate Representative and Dr. William "Bill" Petty agree to sit for depositions no later than November 16th;
- November 17, 2021: Relators agree to sit for depositions no later than November 17th;
- November 19, 2021: Last day for parties to issue discovery requests (ROGs, RFPs, and RFAs) ;
- December 21, 2021: Fact-discovery deadline ;
- December 21, 2021: Dispositive-motions deadline;
- January 21, 2022: Relators' Expert Disclosure deadline;
- February 21, 2022: Defendant's Expert Disclosure deadline;;
- March 4, 2022: Joint Status Report deadline;
- March 31, 2022: Deadline for expert discovery;
- March 31, 2022: Deadline for expert depositions;
- June 20, 2022: 7- to 10-day trial begins;

4. The Parties respectfully move for an extension of all deadlines in this case so as to adequately complete discovery.

5. The requested extensions above are in the best interest of the parties, justice and judicial economy and neither party will be prejudiced by the requested extension.

6. Defendant consents to the relief requested and agrees with the proposed dates set forth above.

WHEREFORE, for the foregoing reasons, the Plaintiffs respectfully request that this Court to modify the current discovery schedule and extend the discovery deadlines as set forth above in this amended motion.

Respectfully submitted this 14th day of September, 2021.

/s/ Larry A. Golston
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CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing document upon all counsel of record as listed below via email on this the 14th day of September, 2021.

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